

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIRECT INVESTMENT PARTNERS AG,

Plaintiff,

-against-

CERBERUS GLOBAL INVESTMENTS, LLC,
CERBERUS CAPITAL MANAGEMENT, L.P.,
CERBERUS PARTNERS, L.P., and CERBERUS
GLOBAL INVESTMENT ADVISORS, LLC,

Defendants.

07 Civ. 3310 (LLS) (RLE)

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Southern and Eastern Districts of New York, I, Lawrence M. Rolnick, a member
in good standing of the bar of this Court, hereby move for an Order allowing the admission pro
hac vice of

Thomas E. Redburn, Jr.
Lowenstein Sander PC
1251 Avenue of the Americas
18th Floor
New York, New York 10020
Tel: 212.262.6700
Fax: 212.262.7402
-and-
65 Livingston Avenue
Roseland, New Jersey 07068
Tel: 973.597.2500
Fax: 973.597.2400

Thomas E. Redburn, Jr. is a member in good standing of the Bar of the State of
New Jersey. There are no pending disciplinary proceedings against Thomas E. Redburn, Jr. in
any State or Federal court.

Dated: July 11, 2007

LOWENSTEIN SANDLER PC

By: 

Lawrence M. Rolnick (LR-0546)

1251 Avenue of the Americas

18th Floor

New York, New York 10020

Tel: 212.262.6700

Fax: 212.262.7402

-and-

65 Livingston Avenue

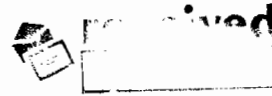
Roseland, New Jersey

Tel: 973.597.2500

Fax: 973.597.2400

*Attorneys for Defendants Cerberus Global
Investments, LLC, Cerberus Capital
Management, L.P., Cerberus Partners, L.P.,
and Cerberus Global Investment Advisors,
LLC*

UNITED STATES DISTRICT COURT
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GLOBAL INVESTMENT ADVISORS, LLC,

Defendants.

07 Civ. 3310 (LLS) (RLE)

**AFFIDAVIT OF LAWRENCE M.
ROLNICK IN SUPPORT OF MOTION
TO ADMIT THOMAS E. REDBURN,
JR. AS COUNSEL PRO HAC VICE**

STATE OF NEW JERSEY)
 : ss.:
COUNTY OF ESSEX)

LAWRENCE M. ROLNICK, being duly sworn, hereby deposes and says as follows:

1. I am a Member of the law firm of Lowenstein Sandler PC, counsel for Defendants Cerberus Global Investments, LLC, Cerberus Capital Management, L.P., Cerberus Partners, L.P., and Cerberus Global Investment Advisors, LLC (collectively, "Defendants") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Thomas E. Redburn, Jr. as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of both the bar of the State of New York and the bar of the United States District Court for the Southern District of New York.

3. I have known Thomas E. Redburn, Jr. since 1996 and have worked closely with him since 2000.

4. Mr. Redburn is a Member of the law firm of Lowenstein Sandler, PC in Roseland, New Jersey.

5. As evidenced by Exhibit A attached hereto, Mr. Redburn is a member in good standing of the bar of the State of New Jersey.

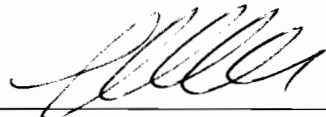
5. I have found Mr. Redburn to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Thomas E. Redburn, Jr., pro hac vice.

7. I respectfully submit a proposed order granting the admission of Thomas E. Redburn, Jr., pro hac vice, which is attached hereto as Exhibit B.


WHEREFORE it is respectfully requested that the motion to admit Thomas E. Redburn, Jr., pro hac vice, to represent Defendants in the above captioned matter, be granted.

Dated: July 11, 2007
Roseland, New Jersey



Lawrence M. Rolnick (LR-0546)

Sworn to before me this
11th day of July, 2007



Notary Public

DIANE D. TAYLOR
A Notary Public of New Jersey
My Commission Expires 04/29/2012

Supreme Court of New Jersey

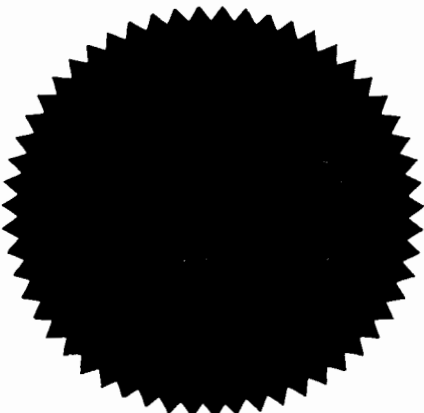


Certificate of Good Standing

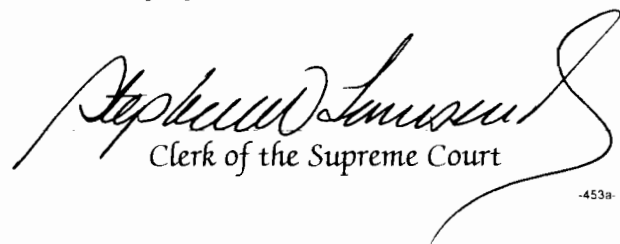
This is to certify that **THOMAS E REDBURN JR**
(No. **033661995**) was constituted and appointed an Attorney at Law of New
Jersey on **January 11, 1996** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
15TH day of **June** , 20 **07**


Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIRECT INVESTMENT PARTNERS AG,

Plaintiff,

-against-

CERBERUS GLOBAL INVESTMENTS, LLC,
CERBERUS CAPITAL MANAGEMENT, L.P.,
CERBERUS PARTNERS, L.P., and CERBERUS
GLOBAL INVESTMENT ADVISORS, LLC,

Defendants.

07 Civ. 3310 (LLS) (RLE)

**PROPOSED ORDER FOR
ADMISSION PRO HAC VICE**

Upon the motion of Lawrence M. Rolnick, counsel for Defendants Cerberus Global Investments, LLC, Cerberus Capital Management, L.P., Cerberus Partners, L.P., and Cerberus Global Investment Advisors, LLC, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Thomas E. Redburn, Jr.
Lowenstein Sander PC
1251 Avenue of the Americas
18th Floor
New York, New York 10020
Tel: 212.262.6700
Fax: 212.262.7402
-and-
65 Livingston Avenue
Roseland, New Jersey 07068
Tel: 973.597.2500
Fax: 973.597.2400

is admitted to practice pro hac vice as counsel for Defendants Cerberus Global Investments, LLC, Cerberus Capital Management, L.P., Cerberus Partners, L.P., and Cerberus Global Investment Advisors, LLC, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is

assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

United States District/Magistrate Judge

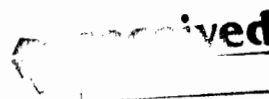
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GLOBAL INVESTMENT ADVISORS, LLC,
Defendants.


Lawrence L. Rolnick, Esq.

07 Civ. 3310 (LLS) (RLE)

CERTIFICATE OF SERVICE

I, **Lawrence M. Rolnick**, do hereby certify:

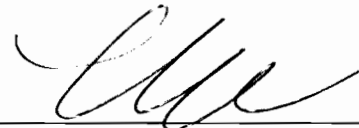
1. I am a Member of the law firm of Lowenstein Sandler PC, counsel for Defendants Cerberus Global Investments, LLC, Cerberus Capital Management, L.P., Cerberus Partners, L.P., and Cerberus Global Investment Advisors, LLC in this matter.

2. Today, I caused to be served, via Federal Express, a true and correct copy of the (i) Motion to Admit Counsel Pro Hac Vice and (ii) Affidavit of Lawrence M. Rolnick in Support of Motion to Admit Thomas E. Redburn, Jr. as Counsel Pro Hac Vice on:

Samuel D. Levy, Esq.
WUERSCH & GERING LLP
100 Wall Street, 21st Floor
New York, New York 10005
Attorneys for Plaintiff Direct Investment Partners AG

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 11, 2007

By: 
Lawrence L. Rolnick, Esq.